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December 31, 2001

Magalie Roman Salas  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Centennial Communications Corp.  
CC Docket No. 94-102; Fourth Quarterly Report on TTY-Digital  
Deployment**

Dear Ms. Salas:

On behalf of Centennial Communications Corp. ("Centennial"), I am submitting this quarterly progress report on implementation of TTY access to Centennial's digital wireless systems. Centennial holds cellular licenses in 31 markets in six states, as well as the B Block broadband PCS license in MTA 25 - Puerto Rico/US Virgin Islands. In Centennial's domestic markets, it utilizes Nortel Networks ("Nortel") infrastructure equipment; in the Caribbean market, Centennial uses Lucent Technologies ("Lucent") infrastructure equipment. As a result, Centennial depends on the implementation of TTY solutions by both Nortel and Lucent. Once the TTY solutions of these equipment manufacturers are commercially available, Centennial will implement them in its markets.

Centennial understands that both Nortel and Lucent will be filing TTY capability status reports through the TTY Forum, and it directs the Commission to those reports for specific information regarding development and deployment activities. Centennial will make every effort to implement TTY access in its markets by the June 30, 2002 deadline. Centennial also notes that its vendors have not yet made their digital TTY solution available to carriers. Therefore, Centennial will not meet the December 31, 2001 deadline established by the Commission in the *Fourth Report and Order*<sup>1</sup> for obtaining all software upgrades and equipment necessary to make its systems capable of transmitting 911 calls from TTY devices. Consequently, while it is not

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<sup>1</sup> Although the Commission's *Fourth Report and Order* contains the December 31, 2001 deadline, Section 20.18 of the rules does not provide for any such requirement.

Magalie Roman Salas

December 29, 2001

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clear that a waiver is required, Centennial respectfully requests a waiver of this requirement, to the extent the Commission deems it necessary.

Please contact me if you require any additional information.

Sincerely,

Theresa Z. Cavanaugh

Cc: Lourdes Lucas  
Kris Monteith, Chief, Policy Division – **Room 3B-103**  
Pam Gregory, Chief, Disabilities Rights Office, CIB  
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